

## Davoodian, Anashe

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**To:** Flores, Valerie  
**Subject:** RE: July 15, 2021 EdTech Meeting - Potential Amendments to Cannabis Regulations

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**From:** Richard McDonald  
**Sent:** Thursday, July 15, 2021 9:02 AM  
**To:** Flores, Valerie <[vflores@cityofpasadena.net](mailto:vflores@cityofpasadena.net)>  
**Subject:** July 15, 2021 EdTech Meeting - Potential Amendments to Cannabis Regulations

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Please provide this email to the City Councilmembers attending today's hearing referenced above.

Dear Chair Hampton and Councilmembers Madison, Wilson, and Rivas:

Integral Associates Dena, LLC, dba Essence, has received, reviewed, and hereby joins in MedMen's July 14, 2021 letter setting forth its objections and opposition to the proposed code amendments proposed in Item 1 of your Agenda for today's meeting. We further repeat and incorporate by reference herein the two letters we submitted in November 2019 and April 2020 on the proposed amendments, which also were provided to you on May 27, 2021. The additional objections set-forth in our May 27, 2021 email are incorporated herein as well.

In short, Integral's position on any such amendments remains the same. There is a mechanism in the ordinance "to fine tune the regulations" to better implement the "purpose of chapter". That does not mean a whole sale revision that is contrary to what residents were told when they approved it. Specifically, residents were told that the City was taking a more cautious approach than the State with distance separation requirements to protect neighborhoods. Entirely jettisoning those protections now to do the same as the State is thus contrary to the purpose of the ordinance.

Further, we note that staff did not answer the specific questions from your last meeting, nor conduct a full, non-results oriented analysis that objectively considers all of the options available. For example, we do not understand how adopting the State's requirements mandates the elimination of the one store per City Council District. As the last map attached to the staff report shows, adopting the State's requirements creates potential sites in Districts 1, 2, and 5, thus allowing that local requirement to remain. There is thus no reason to eliminate that local requirement, which was expressly represented to the residents as a safeguard against over-concentration.

Whether Atrium is still pursuing its site also is unknown and should be verified before taking any action. Otherwise, as is obvious from today's Pasadena Star News article, an incredible amount of staff time

and resources have been spent simply to appease SweetFlower despite the fact that it lost its lawsuit against the City and can easily find another location in Districts 1, 2 or 5 as noted above.

Last, we continue to recommend against doing anything until the current four lawsuits against the City are concluded. In all likelihood, anything you do now will simply create more litigation against the City.

Thank you for your attention and consideration.

Richard A. McDonald, Esq.

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